

73m

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

vs.

**AMERICAN INTERNATIONAL GROUP, INC;
AMERICAN GENERAL CORPORATION;
AMERICAN GENERAL FINANCE, INC.;
MERIT LIFE INSURANCE COMPANY;
YOSEMITE INSURANCE COMPANY;
KATHIE ROWELL; LATANYA KENNEDY
and Fictitious Defendants "A",
"B", and "C", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused
the injuries and damages to the Plaintiff,
all of whose true and correct names are
unknown to Plaintiff at this time, but will
be substituted by amendment when ascertained,**

Defendants.

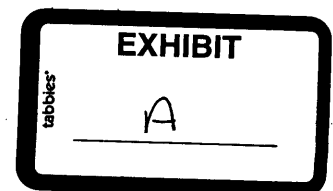
CIVILCASE NO. 05-1653

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2005 JUL - 1 PM 3:42

COMPLAINT

STATEMENT OF THE PARTIES

1. This court has subject matter and personal jurisdiction over the Defendants. Venue is proper in Montgomery County, Alabama.
2. Plaintiff Willie Lee Poole is an adult resident citizen of Montgomery County, Alabama.
3. Defendant American General Finance, Inc., is a foreign corporation who does business throughout the State of Alabama. According to the Secretary of State's office for the State of Alabama, said corporation may be served with process by and through its registered agent, CSC Lawyers Incorporating Service, Inc., 150 S. Perry Street, Montgomery, AL 36104.



4. Defendant American International Group, Inc. is a foreign corporation who does business by agent in Montgomery County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.
5. Defendant American General Corporation is a foreign insurance Company who does business by agent in Montgomery County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.
6. Defendant Merit Life Insurance Company is a foreign insurance company who does business by agent in Montgomery County, Alabama. This Defendant is the agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.
7. Defendant Yosemite Insurance Company is a foreign corporation who does business by agent in Montgomery County, Alabama. This Defendant is the parent corporation, agent, a subsidiary, sister corporation, and/or the "alter-ego" of one or more Defendants.
8. Defendant Kathie Rowell is over the age of nineteen (19) and is a resident of Lee County, Alabama.
9. Defendant Latanya Kennedy is over the age of nineteen (19) and is a resident of Lee County, Alabama.
10. Fictitious Defendants "A", "B", and "C", whether singular or plural, are those other persons, firms, corporations, or other entities whose wrongful conduct caused or contributed to cause the injuries and damages to the Plaintiff, all of whose true and correct names are unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.
11. Plaintiff's claims are brought solely under Alabama law, and Plaintiff states he does not bring any claim and/or disclaim any and all claims under any Federal laws, statutes, or regulations.

STATEMENT OF THE FACTS

12. In or about the year 1990 and other occasions Plaintiff entered into several loans with Defendants at which time Defendants Kathie Rowell and Latanya Kennedy, while acting as agent for all Defendants fraudulently represented to him that if he purchased the credit insurance offered him, his credit score/rating would be better and that he stood a better chance of getting approved for the loan he requested.
13. On or about the same dates, Defendants advised Plaintiff that if he paid off his other debts and consolidated them with the loan that was issued he would save money.
14. Defendants also advised Plaintiff that if he refinanced his previous loans into a single loan, that would be the best way for him to save money. Defendants refused to allow Plaintiff to have a separate loan.
15. Defendants advised Plaintiff that purchasing the credit insurance offered was a good deal and offered great value and protection.
16. Defendants had a duty to Plaintiff to give him good advice and they failed to do so, to Plaintiff's detriment.
17. Based on each of the representations made by Defendants, Plaintiff agreed to purchase the credit insurance offered, refinance his loan and consolidate his other debts.
18. Defendants' conduct under the circumstances was intentional and amounts to actual malice.
19. Plaintiff discovered the fraud within two (2) years of filing this lawsuit.
20. Defendants entered into a pattern or practice of fraudulent conduct that included the fraud practiced on Plaintiff.

21. At all times material hereto, Plaintiff depended on Defendants to advise him as to all loan requirements and insurance matters. Defendants had superior knowledge and bargaining power over Plaintiff.

22. The conduct by Defendants was intentional, gross, wanton, malicious, and/or oppressive.

COUNT ONE

23. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

24. Defendants made the aforementioned fraudulent representations that they knew were false, or should have known were false, and intended for Plaintiff to rely on said false representations.

25. Plaintiff did rely on the representations made by Defendants and due to Defendants' fraudulent misrepresentation of material facts, Plaintiff was induced to act as previously described.

26. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged in at least the following ways: he paid money for insurance he did not want, he lost interest on said money, he paid excessive interest on his loans and accounts he otherwise would not have had to pay, he lost interest on the money attributed to the unnecessary payments, he has suffered mental anguish and emotional distress; and has otherwise been injured and damaged.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT TWO

27. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

28. Defendants negligently and/or wantonly hired, trained, and supervised Defendants Kathie Rowell and Latanya Kennedy and their agents, alter-egos and/or representatives responsible for advising Plaintiff of the loan and insurance benefits and all other requirements.

29. As a proximate consequence of Defendants' actions, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT THREE

30. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.

31. Plaintiff was not experienced in insurance and finance matters and placed a special trust and confidence in Defendants and consequently relied upon Defendants to properly advise him with respect to such matters.

32. Defendants undertook a duty to advise Plaintiff, held themselves out as experts, and as persons interested in Plaintiff's well-being, and generally exhibited behavior inconsistent with the typical debtor-creditor relationship.

33. As a result of the aforementioned actions, Defendants conduct amounts to a breach of their individual, contractual, professional and fiduciary obligations and duties to Plaintiff. Said conduct further amounts to a breach of the duties that arise as a matter of Alabama law.


34. As a proximate consequence of the Defendants breach, Plaintiff was injured and damaged as alleged herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.

COUNT FOUR

35. Plaintiff alleges all prior paragraphs of the Complaint as if set out here in full.
36. Defendants negligently and/or wantonly made the aforementioned representations to Plaintiff.
37. Said action was a breach of the duty owed Plaintiff.
38. As a proximate consequence of said actions, Plaintiff was injured and damaged as described herein.

WHEREFORE, Plaintiff demands judgment against Defendants in such an amount of compensatory and punitive damages as a jury deems reasonable and may award, plus costs.


JERE L. BEASLEY (BEA020)
TOM METHVIN (MET003)
C. LANCE GOULD (GOU007)
Attorneys for Plaintiff

OF COUNSEL:
BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, Alabama 36104
Telephone No.: (334) 269-2343
Facsimile No.: (334) 954-7555

**PLAINTIFF REQUESTS TRIAL BY STRUCK JURY
OF ALL ISSUES PRESENTED BY THIS CAUSE**


OF COUNSEL

CV 2005-1653

State of Alabama Unified Judicial System Form ARCiv-93 Rev. 5/89	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Case Number <input checked="" type="checkbox"/> C <input type="checkbox"/> V
IN THE CIRCUIT COURT OF <u>Montgomery</u> , ALABAMA <u>Willie Lee Poole</u> (Name of Plaintiff) v. <u>American International Group, Inc.</u> (Name of Defendant)		Date of Filing:
First Plaintiff <input type="checkbox"/> Business <input type="checkbox"/> Government <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Other	First Defendant <input checked="" type="checkbox"/> Business <input type="checkbox"/> Government <input type="checkbox"/> Individual <input type="checkbox"/> Other	Judge Code:
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) the best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input checked="" type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction <input type="checkbox"/> CVUD - Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> FORJ - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORF - Foreign Judgment <input type="checkbox"/> MSHC - Fruits of Crime Forfeiture <input type="checkbox"/> PFAB - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> FELA - Protection From Abuse <input type="checkbox"/> RPRO - Railroad/Seaman (FELA) <input type="checkbox"/> WTEG - Real Property <input type="checkbox"/> COMP - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> CVXX - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property	OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Services	
ORIGIN (check one): F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER: R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: 		
Date <u>7/1/05</u>		
Signature of Attorney/Party filing this form: _____		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;
et al.,

Defendants.

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* Civil Action No. 05-1653
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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN INTERNATIONAL GROUP, INC.
70 Pine Street
New York, NY 10270 D1

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman
CIRCUIT CLERK

Dated: 7/12/05

American International Group, Inc.
70 Pine Street
New York, NY 10270

Certified Article Number

7160 3901 9848 8110 5263

SENDERS RECORD

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2005 JUL - 12 PM 3:42

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;
et al.,

Defendants.

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* Civil Action No. 05-1653
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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL CORPORATION
2929 Allen Parkway
Houston, TX 77019

D2

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy written Answer, either admitting or denying each allegation in the Complaint to,

Roman A. Shaul
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2005 JUL - 1 PM 3:42

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman

CIRCUIT CLERK

Dated: 7/12/05

American General Corporation
2929 Allen Parkway
Houston, TX 77019

Certified Article Number

7160 3901 9848 8110 5256

SENDERS RECORD

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,
INC., et al.,

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CIVILCASE NO. 05-1653

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

AMERICAN GENERAL FINANCE, INC.
n/k/a American General Financial Services of Alabama, Inc.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104 D3

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

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CIRCUIT COURT OF
MONTGOMERY COUNTY
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the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittenger
CIRCUIT CLERK

Dated: 7/12/05

American General Finance, Inc.
n/k/a American General Financial Services of
Alabama
c/o CSC Lawyers Incorporating Service
150 S. Perry Street
Montgomery, AL 36104

Certified Article Number
7160 3901 9848 8110 5249
SENDERS RECORD

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,
INC., et al.,

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CIVILCASE NO. 05-1653

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO: AMERICAN GENERAL FINANCIAL
SERVICES OF ALABAMA, INC.
c/o CSC Lawyers Incorporating Service, Inc.
150 S. Perry Street
Montgomery, AL 36104

D4

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2005 JUL - 1 11:43:42

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman
CIRCUIT CLERK

Dated: 7/12/05

American General Financial
Services of Alabama
c/o CSC Lawyers Incorporating Service
150 S. Perry Street
Montgomery, AL 36104

Certified Article Number
7160 3901 9848 8110 5232
SENDERS RECORD

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

vs.

AMERICAN INTERNATIONAL GROUP,
INC., et al.,

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CIVILCASE NO. D5-11653

SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

MERIT LIFE INSURANCE COMPANY
c/o Superintendent of Insurance
601 NW Second Street
Evansville, IN 47708

D5

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of a written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

2005 JUL 11 PM 3:42

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Melissa Pittman

CIRCUIT CLERK

Dated: 7/12/05

Merit Life Insurance
c/o Superintendent of Insurance
601 NW Second Street
Evansville, IN 47708

Certified Article Number

7160 3701 9848 8110 5218

SENDERS RECORD

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

WILLIE LEE POOLE,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC;
et al.

Defendants.

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* Civil Action No. 05-1653
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SUMMONS

This service by personal service of this summons is initiated upon the written request of Plaintiff's attorney pursuant to the Alabama Rules of Civil Procedure.

NOTICE TO:

YOSEMITE INSURANCE COMPANY
c/o Superintendent of Insurance
717 Market Street
San Francisco, CA 94103 DL

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You are required to mail or hand deliver a copy of written Answer, either admitting or denying each allegation in the Complaint to,

C. Lance Gould
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
Post Office Box 4160
Montgomery, AL 36103-4160

the attorney for the Plaintiff. THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN THIRTY (30) DAYS FROM THE DATE OF DELIVERY OF THIS SUMMONS AND COMPLAINT AS EVIDENCED BY THE RETURN RECEIPT, OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT. You must also file the original of your Answer with the Clerk of this Court within a reasonable time afterward.

Dated: 7/12/05

Yosemite Insurance Company
c/o Superintendent of Insurance
717 Market Street
San Francisco, CA 94103

Melissa Pittman
CIRCUIT CLERK

Certified Article Number


7160 3901 9848 8110 5225

SENDERS RECORD

FILED
CIRCUIT COURT OF
MONTGOMERY COUNTY
2005 JUL -1 PM 3:42

TSM

2. Article Number



7160 3701 7848 8110 5249

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee)

1. Article Addressed to:

American General Finance, Inc.
n/k/a American General Financial Services
Alabama
c/o CSC Lawyers Incorporating Service
150 S. Perry Street
Montgomery, AL 36104

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Signature *[Signature]* **JAMES S. BELLAMY**

B. Date of Delivery **7-14-05**

☒ Agent ☐ Addressee

C. Is delivery address different from item 1? ☐ Yes ☒ No

If Yes, please specify below: **Agent for Willie Lee Poole, P.C.**

2005-1053 **57C** **D003**

Reference Information

Willie Lee Poole v. American
Internation
C. Lance Gould


BEA020

PS Form 3811, July 2001 Domestic Return Receipt

P- Willie Poole
d- American International

TSM

2. Article Number



7160 3701 7848 8110 5232

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

American General Financial
Services of Alabama
c/o CSC Lawyers Incorporating Service
150 S. Perry Street
Montgomery, AL 36104

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery **7-14-05**

C. Signature **[Signature]**

AMES S. BRILLANTY

☐ Agent
☐ Addressee

☐ Yes
☐ No

CV 2005-1653 D004

Reference Information


Willie Lee Poole v. American
Internation
C. Lance Gould

PS Form 3811, July 2001 Domestic Return Receipt

FILED
JUL 20 2005
MONTGOMERY, AL
MISSISSIPPI

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TSM


2. Article Number		COMPLETE THIS SECTION ON DELIVERY	
 7160 3901 9248 8110 5218		A. Received by (Please Print Clearly) <u>Rodney J. Schmitt</u> B. Date of Delivery	
3. Service Type CERTIFIED MAIL		C. Signature <u>Rod Schmitt</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		D. Is delivery address different from item 1? If YES, enter delivery address below:	
1. Article Addressed to:		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Merit Life Insurance c/o Superintendent of Insurance 601 NW Second Street Evansville, IN 47708		EVANSVILLE IN MAIN OFFICE ATTORNEY CV 05-1053 D005 Reference to 1005 Willie Lee Poole v. American International C. Lance Gould	
BEA 020		JUL 2005 FILED Melissa Rittenour Circuit Clerk	
PS Form 3811, July 2001		Domestic Return Receipt	

P- Willie Poole

d- American International Group

TSM

2. Article Number



7110 3701 7848 8110 5256

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) ☒ Yes

1. Article Addressed to:

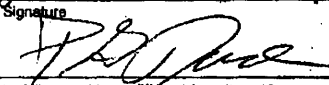
Jul 2005

American General Corporation
2929 Allen Parkway
Houston, TX 77019

Elis Rittenour
Circuit Clerk

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **JA JONES** B. Date of Delivery **7-18**

C. Signature **X**  ☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

CV2005-1653 D002 **STC**

Reference Information

Willie Lee Poole v. American
Internation

C. Lance Gould

PS Form 3811, July 2001 Domestic Return Receipt